

## Remarks

Claims 1-18 are currently pending in the present application. Claims 1, 11, 14, 17 and 18 are independent claims. All claims have been rejected in the Office Action dated October 21, 2003. Applicant traverses each of these rejections as discussed in detail below.

### ***Rejections Under 35 USC. §102***

The Office Action rejects claims 1, 2, 4-9, 11, 14, 17 and 18 under 35 U.S.C. §102(e) as being anticipated by US Patent No. 6,587,822 to Brown, et al. ("Brown"). However, as will be discussed in greater detail below, Brown does not anticipate the foregoing claims. Brown discloses a speech recognition (SR) system that can *interpret Web pages*, modified only by the insertion of grammar tags. In contrast, the present invention uses scripts for the *control of* a SR system and interfacing the scripts to the SR system (e.g., with interface objects). In the present invention, the application scripts have logical and data processing control over the SR system.

Specifically, the Office Action collectively rejects independent claims 1, 11 and 18. For example, the Office Action asserts that Brown (FIG. 2, element 122; col. 4 lines 31-41; and col. 13 lines 19-36) anticipates element "A" of claim 1:

A. a speech recognition (SR) system configured to receive an audio input and generate a set of *semantic data representing a plurality of valid interpretations* of said audio input;

Note that element 122 of Brown's FIG. 2 is a "speech recognizer" and the text from col. 4 mentions the same. But there is nothing in the Brown cites that discloses, suggests or anticipates "a set of *semantic data representing a plurality of valid interpretations*". The mere mention of a SR system does not anticipate a SR system that can generate *valid interpretations of the audio input*. Consequently, this element of claim 1 is not anticipated by Brown.

Furthermore, the Office Action asserts that Brown (col. 13 lines 19-35) teaches element B of claim 1:

B. a *speech application script*, loaded at the SR system and configured to *task said SR system*, said application script defining a context;

The Brown cite provided in the Office Action does not give any hint of a *speech application script* that *tasks* the SR system. This is a fundamental difference between Brown and the present invention. In contrast to the present invention, Brown discusses a system that interprets Web pages. For example, Brown states in col. 1, lines “The speech synthesizer generates speech which characterizes the structure and content of a web page retrieved over the network.” Brown does not anticipate the *speech application script* of this element of claim 1, which can *task* an SR system.

And, the Office Action asserts that Brown teaches element “C” of claim 1, including “a semantic data evaluator, configured to ...*return said linguistic result to said application script*”. As mentioned above, a *speech application script* is not anticipated or taught by Brown. Correspondingly, the *semantic data evaluator* of element “C”, which returns a linguistic result to a *speech application script*, is not, therefore, anticipated by the Brown cites.

And, finally, the Office Action asserts that element “D” of claim 1 is anticipated by Brown (FIG. 2, element 122, and col. 4 lines 31-41). Element D provides:

D. a set of reusable object oriented interfaces local to the SR system, said *interfaces configured to interface said application script with said SR system*.

Brown does not anticipate or disclose object oriented interfaces (or any other interfaces) *configured to interface said application script with said SR system*. Since Brown does not disclose a *speech application script* configured to task an SR system, Brown is naturally silent on interface to interfaces a speech application script to a SR system, whether object oriented or not.

With regard to dependent claim 2, the Office Action incorrectly analogizes a script in a web page, which is not uncommon, with a *speech application script for tasking a SR system*, which is provided within a Web page. That is, the Brown cite does not disclose a Web page having a *speech application script for tasking a SR system*. Further, claim 1, from which claim 2 depends is believed patentable over Brown; thus claim 2 is also patentable.

With regard to dependent claim 4, since Brown does not anticipate a *speech application script* of any kind, it does not anticipate a *speech application script* written in Jscript, PerlScript, or VBscript. Further, claim 1, from which claim 4 depends is believed patentable over Brown;

thus claim 4 is also patentable.

With regard to dependent claim 5, the Office Action cites col. 13 lines 30-35 of Brown as disclosing that *the set of semantic data is represented as a semantic tree instance*. Yet, while this Brown cite mentions a semantic parser, it does not disclose anything relating to a *semantic tree* or *semantic tree instance*. Rather, it discloses “*Interpretation [of web hyperlink titles] that can be done in two stages ...*” using “hash tables”, but *interpretation* (Brown) of hyperlinks and *representation* of semantic data (claim 5) are different. And hash tables and a semantic tree are not related. Even so, the Brown cite does not disclose a *semantic tree* even in the context of interpretation. Further, claim 1, from which claim 5 depends is believed patentable over Brown; thus claim 5 is also patentable.

With regard to dependent claim 6, the Office Action cites Brown col. 13 lines 19-35 as disclosing representing semantic data in a semantic object. However, this Brown cite mentions nothing regarding semantic objects. Rather, its emphasis is on interpreting speech represented in a Web page using hash tables. Further, claim 1, from which claim 6 depends is believed patentable over Brown; thus claim 6 is also patentable.

With regard to dependent claims 7-8, claim 1, from which these claims depend is believed patentable over Brown; thus claims 7-8 are also patentable.

With regard to claim 9, the Office Action asserts that col. 13 lines 18-36 of Brown discloses valid interpretations of audio input within a context. However, “context” in Brown is used for text-to-speech, not for semantic interpretation of an utterance. Further, claim 1, from which claim 9 depends is believed patentable over Brown; thus claim 9 is also patentable.

With regard to independent claims 14 and 17, for the reasons set forth above, these claims are also not anticipated by Brown.

For all of the foregoing reasons, claims 1, 2, 4-9, 11, 14, 17 and 18 are not anticipated by Brown. The Applicant respectfully respects withdrawal of the rejections to these claims under 35 U.S.C. §102(e).

### ***Rejections Under 35 USC. §103***

The Office Action rejects claims 3, 10, 12, 13, 15 and 16 under 35 U.S.C. §103(a) as being obvious in view of Brown and US Patent No. 6,606,744 to Mikurak, et al. ("Mikurak"). Each of these claims is dependent on an independent claim discussed above with respect to the rejections under 35 U.S.C. §102(e). Applicant believes that the independent claims from which these rejected claims depend are patentable, so contends that these dependent claims are also patentable.

There is no motivation to combine the speech recognition system for the interpretation of Web pages of Brown with the "A system, method ...for collaborative installation management in a network-based supply chain environment" of Mikurak (see Abstract). The Office Action does not meet its burden under 35 U.S.C. §103(a) without such a motivation. (See MPEP 2143.) Accordingly, these rejections should be withdrawn.

Specifically, with respect to claims 3, 13 and 15, the Office Action asserts that Brown discloses several elements of these claims, but that Brown fails to teach interfaces exposed via ActiveX facilities, but that Mikurak does in col. 15 lines 21-40. However, as discussed above, Brown does not disclose a *speech application script for tasking an SR system* (claim 1), so does not discuss, or require, an interface between a speech application script and an SR system. In light of this, the disclosure of Mikurak is irrelevant in this instance. Additionally, as discussed above, there is no motivation within the references for a combination of Brown and Mikurak.

And, with respect to claims 10, 12, and 16, the Office Action asserts that Brown discloses several elements of these claims, but that Brown fails to teach the claimed applications, but that Mikurak does in various places. However, as discussed above, Brown does not disclose a *speech application script for tasking an SR system* (claim 1), so does not discuss use of such *speech application scripts* in the contexts of the claim applications. In light of this, the disclosure of Mikurak is irrelevant in this instance. Additionally, as discussed above, there is no motivation within the references for a combination of Brown and Mikurak.

For all of the foregoing reasons, claims 3, 10, 12, 13, 15 and 16 are not obvious in view of Brown and Mikurak, whether alone or in combination. The Applicant respectfully respects

withdrawal of the rejections to these claims under 35 U.S.C. §103(a).

The Commissioner is hereby authorized to charge any additional fees under 37 C.F.R. §1.16 and §1.17 that may be required, or credit any overpayment, to our Deposit Account No. 50-1133.

Respectfully submitted,



David M. Mello, Reg. No. 43,799  
McDermott, Will & Emery  
28 State Street  
Boston, MA 02109  
Tel (617) 535-4037  
Fax (617) 535-3800  
E: dmello@mwe.com

Date: January 21, 2004